

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
Fred's, Inc., <i>et al.</i> ¹)	
)	Case No. 19-11984 (CSS)
)	
Debtors.)	Jointly Administered
)	

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 30, 2019 AT 12:00 P.M. (EASTERN DAYLIGHT TIME)

ADJOURNED/RESOLVED MATTERS

1. Elvin Garner on Behalf of Alvin Garner's Motion for Relief from Automatic Stay Under 11 U.S.C. § 362 (D.I. 149, Filed 9/23/19).

Objection Deadline: October 9, 2019, extended to November 12, 2019 at 4:00 p.m. (EST) for the Debtors.

Responses Received: None as of the filing of this Agenda.

Related Pleadings: None as of the filing of this Agenda.

Status: By agreement of the parties, this matter has been adjourned to the hearing on November 19, 2019 at 2:00 p.m. (EST).

2. Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Hilco IP Services, LLC d/b/a Hilco Streambank as Intellectual Property Disposition Consultant, Effective *Nunc Pro Tunc* to September 26, 2019 and (II) Granting Related Relief (D.I. 264, Filed 10/9/19).

Objection Deadline: October 23, 2019 at 4:00 p.m. (EDT).

Responses Received:

- a) Informal comments from the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee").

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Fred's Stores of Tennessee, Inc. (9888); Fred's Inc. (4010); National Equipment Management and Leasing, Inc. (4296); National Pharmaceutical Network, Inc. (9687); Reeves-Sain Drug Store, Inc. (4510); Summit Properties-Jacksboro, LLC (9161); Summit Properties-Bridgeport, LLC (2200); and 505 N. Main Opp, LLC (5850). The Debtors' address is 43000 New Getwell Road, Memphis, TN 38118.

Related Pleadings:

- a) Certificate of Counsel Regarding Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Hilco IP Services, LLC d/b/a Hilco Streambank as Intellectual Property Disposition Consultant, Effective *Nunc Pro Tunc* to September 26, 2019 and (II) Granting Related Relief (D.I. 369, Filed 10/24/19); and
- b) Order (I) Authorizing the Retention and Employment of Hilco IP Services, LLC d/b/a Hilco Streambank as Intellectual Property Disposition Consultant, Effective *Nunc Pro Tunc* to September 26, 2019 and (II) Granting Related Relief (D.I. 375, Entered 10/25/19).

Status: An order has been signed. No hearing is necessary.

MATTERS GOING FORWARD

- 3. Debtors' Motion for an Order (I) Establishing Procedures for the Sale of Debtors' Real Estate Assets, (II) Authorizing the Debtors to Retain and Compensate Real Estate Brokers in Connection Therewith, (III) Approving Stalking Horse Bid Protections (IV) Approving the Sale of the Debtors' Real Estate Assets Free and Clear of All Encumbrances Pursuant to Section 363 of the Bankruptcy Code and (V) Granting Related Relief (D.I. 112, Filed 9/17/19).

Objection Deadline: October 29, 2019 at 3:00 p.m. (EDT).

Responses Received: None as of the filing of this agenda.

Related Pleadings:

- a) Notice of Filing of Revised Exhibits to Debtors' Motion for an Order (I) Establishing Procedures for the Sale of Debtors' Real Estate Assets, (II) Authorizing the Debtors to Retain and Compensate Real Estate Brokers in Connection Therewith, (III) Approving Stalking Horse Bid Protections (IV) Approving the Sale of the Debtors' Real Estate Assets Free and Clear of All Encumbrances Pursuant to Section 363 of the Bankruptcy Code and (V) Granting Related Relief (D.I. 117, Filed 9/17/19);
- b) Order (I) Establishing Procedures for the Sale of Debtors' Real Estate Assets, (II) Authorizing the Debtors to Retain and Compensate Real Estate Brokers in Connection Therewith, (III) Approving Stalking Horse Bid Protections and (IV) Granting Related Relief (D.I. 204, Entered 9/27/19);
- c) Notice of Bid Deadline, Auction and Sale Hearing (D.I. 211, Filed 9/27/19);

- d) Declaration of Beau Bevis in Connection with the Debtors' Motion for an Order (I) Establishing Procedures for the Sale of Debtors' Real Estate Assets, (II) Authorizing the Debtors to Retain and Compensate Real Estate Brokers in Connection Therewith, (III) Approving Stalking Horse Bid Protections (IV) Approving the Sale of the Debtors' Real Estate Assets Free and Clear of All Encumbrances Pursuant to Section 363 of the Bankruptcy Code and (V) Granting Related Relief (D.I. 225, Filed 10/3/19);
- e) Debtors' Notice of Designation of Stalking Horse Bidders (D.I. 286, Filed 10/11/19); and
- f) Notice of Change of Auction Location and Time for Proposed Sale of Debtors' Real Estate Assets (D.I. 364, Filed 10/23/19).

Status: This matter is going forward.

- 4. Motion of Swanson Developments, L.P. for Relief from the Automatic Stay (D.I. 201, Filed 9/27/19).

Objection Deadline: October 9, 2019, extended to October 10, 2019 at 11:00 a.m. (ET) for the Debtors.

Responses Received:

- a) Debtors' Objection to Motion of Swanson Developments, L.P. for Relief from the Automatic Stay (D.I. 270, Filed 10/10/19).

Related Pleadings:

- a) Reply of Swanson Developments, L.P. in Support of its Motion for Relief from the Automatic Stay (D.I. 280, Filed 10/11/19).

Supplemental Letter Briefs

- a) Supplemental Submission of Swanson Developments, L.P. in Support of its Motion for Relief from the Automatic Stay (D.I. 378, Filed 10/25/19); and
- b) Debtors' letter brief (D.I. 382, Filed 10/25/19).

Status: This matter is going forward.

- 5. Application of the Official Committee of Unsecured Creditors of the Debtors, Fred's Inc., *et al.*, for Order: (A) Authorizing Employment and Retention of Alvarez & Marsal North America, LLC as Financial Advisor *Nunc Pro Tunc* to the September 23, 2019 (D.I. 263, Filed 10/9/19).

Objection Deadline: October 23, 2019 at 4:00 p.m. (ET).

Responses Received:

a) Informal comments from the U.S. Trustee.

Related Pleadings: None.

Status: This matter is going forward.

Dated: October 28, 2019
Wilmington, Delaware

/s/ Joseph C. Barsalona II

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